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Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,	)	Case No. 18-CR-00258 EJD
	)	
Plaintiff,	)	DECLARATION OF KELLY I. VOLKAR IN
	)	SUPPORT OF UNITED STATES' OPPOSITION
v.	)	TO DEFENDANT'S MOTION TO EXCLUDE
	)	TRIAL EXHIBITS 3790 AND 4871 AND
RAMESH "SUNNY" BALWANI,	)	RELATED TESTIMONY
	)	
Defendant.	)	Date: April 29, 2022
	)	Time: 8:30 a.m.
	)	Court: Hon. Edward J. Davila

1 I, Kelly I. Volkar, declare:

2 1. I am an Assistant United States Attorney (AUSA) representing the United States of  
3 America, the plaintiff in this case.

4 2. Attached hereto as Exhibit 1 is a true and correct copy of Trial Exhibit 4059, produced in  
5 discovery starting with Bates label MENDENHALL-000020.

6 3. I declare under penalty of perjury under the laws of the United States of America that the  
7 foregoing is true and correct and that this declaration is executed at Walnut Creek, California, on  
8 April 28, 2022.

9  
10 DATED: April 28, 2022

11 /s/ Kelly I. Volkar  
12 KELLY I. VOLKAR  
13 Assistant United States Attorney  
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